UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

13 AUG 2007

Stephanie A Strength
Rural Utilities
Engineering and Environmental Staff
1400 Independence Avenue, SW, Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

Re: Associated Electric Cooperative, Inc. Proposed 660 MW Baseload Power Plant near Norborne, Carroll County, Missouri

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the proposed 660 MW coal-fired electricity generating unit and associated electrical transmission and railroad facilities proposed by Associated Electric Cooperative, Inc. of Springfield, Missouri. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The FEIS was assigned the CEQ number 20070290.

Thank you for affirmatively addressing most of our comments on the Draft Environmental Impact Statement into the FEIS. The additional information concerning mercury risk, drinking water, and wetlands address our previously expressed concerns on these issues.

We do however recommend additional analysis of specific air quality impacts, and completion of unfinished wooded wetland and floodplains studies prior to publication of the Record of Decision (ROD). EPA requests to be a recipient of the signed ROD.

Please contact me at 913-551-7975, if you have any questions or concerns regarding this letter.

Sincerely,,

Kimberly O. Johnson, P.E.
NEPA Reviewer
Environmental Services Division

cc: Gina Grier, EPA, Region 7, ARTD/APDB
Vicky Johnson, EPA, Region 7, WWPD/WPIB
Kyra Moore, MDNR, Jefferson City, MO
Jane Ledwin, USFWS, Columbia, MO

DETAILED COMMENTS

Associated Electric Cooperative, Inc.
Proposed Coal-based Power Plant and Transmission Facilities
Carroll County, Missouri

1) Air Quality (ozone) – As requested in our letter dated October 26, 2005, and our DEIS comments submitted on March 7, 2007, we continue to recommend that the potential ozone impacts from the facility be fully assessed through modeling. The ambient air ozone values measured during pre-construction monitoring, and presented in the FEIS (Table 3.5), verify that ozone values above the National Ambient Air Quality Standard (NAAQS) are present in the project area prior to construction of the facility. This project will result in an increase of emissions of ozone precursors and may potentially contribute to unhealthy ozone levels downwind of the facility.

   Given the existing ozone data recorded from the pre-construction monitoring, we also recommend that ozone monitoring be continued throughout the ozone seasons prior to and after construction of the facility. This monitoring data can be used as a baseline to document the existing condition and assist in further assessing the impact of the facility's emissions on ozone formation.

2) Air Quality (Kansas City Ozone) – Based on preliminary data for the 2007 ozone season, Kansas City has recently measured a number of exceedances of the ozone NAAQS. We recommend updating the "Existing Ambient Air Quality" section, page 3-31, to reflect the most current air quality status in the project area.

3) Ozone Monitoring Data – Table 3-5 lists three columns with an "8-Hour 2nd High" heading. It appears that this is a typographical error and should be corrected to include the "3rd High" and "4th High" values.

4) Greenhouse Gas Emissions – Although USDA/RD has stated that the greenhouse gas emissions from the facility are not significant in terms of the global climate change, EPA encourages consideration of greenhouse gas reduction methods for proactive pollution prevention and good environmental stewardship. Please refer to the following web site for information regarding EPA's greenhouse gas reduction initiatives: http://www.epa.gov/climatechange/policy/neartermghgreduction.html.

5) Floodplain Impact Assessment - EPA recommends that the flooding study to determine cumulative effects of the proposed development (page 3-112) be completed prior to the Record of Decision. A two dimensional analytical model should be used to precisely determine elevation rise, and to also better determine floodplain impacts that may be realized from the project's floodplain footprint. Construction within the floodplain has the potential to increase flood water surface elevation, increase stormwater runoff, and alter the pattern of erosion and accretion in the floodplain. Even slight increases in flood water elevation may have adverse impacts on neighboring communities, and increased

velocities within the floodplain may cause scour at important hard points, such as existing levees.

6) Wooded Wetlands - The potential loss of wooded wetlands needs to be addressed prior to the Record of Decision. The EPA has identified forested wetlands as a priority habitat type in Missouri. It is particularly important that the riparian and wetland corridors of West Fork Wakenda Creek and Wakenda Creek are preserved as these watersheds have been identified as an aquatic conservation focus area by the EPA. Therefore the project should consider alternatives for the railroad corridor and transmission lines that avoid or minimize and mitigate impacts to these priority wetlands and riparian areas.